

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

AMRIT KUMAR and TONY TEP,  
Individually and on Behalf of All Others Similarly  
Situated,

Plaintiff,

v.

SAEXPLORATION HOLDINGS, INC., JEFF  
HASTINGS, BRIAN BEATTY, BRENT  
WHITELEY, L. MELVIN COOPER, GARY  
DALTON, DAVID D. SGRO, GREGORY R.  
MONAHAN, and MICHAEL FAUST,

Defendants.

CLASS ACTION

Case No. 4:19-cv-03089

**LEAD PLAINTIFFS' MOTION FOR FINAL APPROVAL OF THE PROPOSED CLASS  
ACTION SETTLEMENT, PLAN OF ALLOCATION, AND CLASS CERTIFICATION**

PLEASE TAKE NOTICE that Lead Plaintiffs Amrit Kumar and Tony Tep, by and through their attorneys, individually and on behalf of all others similarly situated, will and hereby do move this Court on August 12, 2021 at 9:00 a.m., the date and time previously set by the Honorable Andrew S. Hanen, United States District Court for the Southern District of Texas, 515 Rusk Avenue, Houston, Texas 77002 for an order: (i) finally approving the Proposed Class Action Settlement, (ii) finally approving the Plan of Allocation, and (iii) finally certifying the Proposed Settlement Class.

This motion is based on the accompanying: (i) Memorandum of Law in Support of Co-Lead Plaintiffs' Motion for Award of Attorneys' Fees, Reimbursement of Expenses, and Compensatory Award to Lead Plaintiffs; (ii) the Joint Declaration of Reed M. Kathrein and Philip Kim in Support of (1) Lead Plaintiffs' Motion for Final Approval of Proposed Class Action

Settlement, Plan of Allocation, and Class Certification; and (2) Lead Counsels' Motion for an Award of Attorneys' Fees, Reimbursement of Expenses, and Award to Lead Plaintiffs, and the exhibits attached thereto; and (iv) the pleadings and records on file in this action, including the Stipulation and Agreement of Settlement (ECF No. 90) and the exhibits thereto, and other such matters and argument as the Court may consider at the hearing on this motion.

Dated: June 1, 2020

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

I hereby certify that on June 1, 2021, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the e-mail addresses registered in the CM/ECF system, as denoted on the Electronic Mail Notice List, and I hereby certify that I have mailed a paper copy of the foregoing document via the United States Postal Service to the non-CM/ECF participants indicated on the Manual Notice List generated by the CM/ECF system.

/s/ Stuart L. Cochran

Stuart L. Cochran